

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Delta Terminal Services LLC - Geismar Logistics Center
Agency Interest No.: 147113
Delta Terminal Services LLC
Geismar, Ascension Parish, Louisiana

I. BACKGROUND

Delta Terminal Services LLC, Delta Terminal Services LLC - Geismar Logistics Center, is a planned terminal, which will serve as a loading operations facility. This is the initial permit for Delta Terminal Services LLC - Geismar Logistics Center.

II. ORIGIN

A permit application and Emission Inventory Questionnaire (EIQ) dated November 17, 2006 were received requesting a permit.

III. DESCRIPTION

Delta Terminal Services, L.L.C. is proposing to construct a Drum and Tote Operation, and Ship and Barge Transfer Facility on an undeveloped 24 acre site in Ascension Parish, Geismar. The proposed facility will allow Delta Terminal Services, L.L.C. to service the needs of local industry. The facility will load Aniline, MDI, Polyols, and MDI / TDI blends into drums and totes. Nitrobenzene and TONOX (4,4-Methylenedianiline) will be loaded into drums only. MDI and MDI / TDI blends will be loaded into tank trucks. Aniline and MDI will also be loaded into barges and ships. The facility will use chlorobenzene to perform ship and barge cleaning operations. The facility loading throughputs are as follows:

- Aniline: 6,516,986 gallons/year
- MDI: 55,487,327 gallons/year
- Polyols: 8,703,297 gallons/year
- Nitrobenzene: 98,901 gallons/year
- MDI and TDI blends: 1,872,000 gallons/year
- TONOX: 22,000 gallons/year

A 500 gallon diesel storage tank is included as an insignificant activity in this permit.

The facility requests the flexibility to conduct loading operations of other commodities in the future. The vapor pressure of any new commodity will be less than 1.5 psia. Hence, in order to have this flexibility, Delta Terminal Services L.L.C. requests a facility wide emissions cap of 9.0 tons per year for any individual Toxic Air Pollutant (TAP) with a vapor pressure less than 1.5 psia; 24.00 tons per year for combined TAPs, and 45 tons per year of VOCs.

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Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before
PM ₁₀	-
SO ₂	-
NO _x	-
CO	-
VOC ¹	45.00
TAP ²	24.00

¹ Facility wide CAP for total VOC (including toxic VOC)

² Facility wide CAP for combined TAPs

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year
Single TAP*	<9.00
Total TAPs	24.00

*Single TAP includes all Louisiana Toxic Air Pollutants with a vapor pressure less than 1.5 psia listed in LAC 33:III.5112

IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs).

V. PUBLIC NOTICE

A notice requesting public comment on the permit was published in The Advocate, Baton Rouge, on <date>, 200X; and in the Gonzales Weekly, Gonzales, Louisiana, on <date>, 200X. A copy of the

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public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. All comments will be considered prior to the final permit decision.

VI. EFFECTS ON AMBIENT AIR

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Ambient Air Quality Standard (NAAQS)
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VII. GENERAL CONDITION XVII ACTIVITIES

Work Activity	Schedule	PM ₁₀	Emission Rates - tons			
			SO ₂	NO _x	CO	VOC

VIII. INSIGNIFICANT ACTIVITIES

ID No.:	Description	Citation
	500 gallon Diesel storage tank	LAC 33:III.501.B.5.A.3

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated November 17, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 147113 Delta Terminal Services LLC - Geismar Logistics Center
Activity Number: PER20060001
Permit Number: 0180-00194-00
Air - Minor (Synthetic) Initial

Also Known As: ID Name User Group Start Date
0180-00194 Delta Terminal Services LLC - Geismar Logistics Center (not the same as AI 122402) CDS Number 11-28-2006

Physical Location: 4268 Hwy 73 Geismar, LA 70734 Main Phone: 2256755387

Mailing Address: 7116 Hwy 22, PO Box 625 Sorrento, LA 707780625

Location of Front Gate: 30° 12' 16" latitude, 91° 0' 50" longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD83

Name	Mailing Address	Phone (Type)	Relationship
Gene Taft	7116 Hwy 22, PO Box 625 Sorrento, LA 707780625	2256755387 (WP)	Responsible Official for
Gene Taft	7116 Hwy 22, PO Box 625 Sorrento, LA 707780625	2256755387 (WP)	Air Permit Contact For

Name	Address	Phone (Type)	Relationship
Delta Terminal Services LLC	7116 Hwy 22, PO Box 625 Sorrento, LA 707780625	2256755387 (WP)	Air Billing Party for
Delta Terminal Services LLC	7116 Hwy 22, PO Box 625 Sorrento, LA 707780625	2256755387 (WP)	Operates
Delta Terminal Services LLC	7116 Hwy 22, PO Box 625 Sorrento, LA 707780625	2256755387 (WP)	Owns

SIC Codes: 4226, Special warehousing and storage, nec

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center
 Activity Number: PER20060001
 Permit Number: 0180-00194-00
 Air - Minor (Synthetic) Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
ARE001	13-06 - Barge and Ship Cleaning		7422 bbl/yr	7422 bbl/yr		8760 hr/yr (All Year)
EQT001	1-06 - Tank 1 - Aniline Tank	27751 bbl				8760 hr/yr (All Year)
EQT002	2-06 - Tank 2 - Aniline Tank	16688 bbl				8760 hr/yr (All Year)
EQT003	3-06 - Tank 3 - MDI Tank	18320 bbl				8760 hr/yr (All Year)
EQT004	4-06 - Tank 4 - MDI Tank	23107 bbl				8760 hr/yr (All Year)
EQT005	5-06 - Tank 5 - MDI Tank	23107 bbl				8760 hr/yr (All Year)
EQT006	6-06 - Tank 6 - MDI Tank	13598 bbl				8760 hr/yr (All Year)
EQT007	7-06 - Barge and Ship Transfer Operations		212950 bbl/yr	212950 bbl/yr		8760 hr/yr (All Year)
EQT008	8-06 - Drum and Tote Operations (Lines 1-10)		1.47 MM bbl/yr	1.47 MM bbl/yr		8760 hr/yr (All Year)
EQT009	9-06 - Tank Truck Loading Operations		29906 bbl/yr	29906 bbl/yr		8760 hr/yr (All Year)
EQT010	10-06 - Tank 7 - MDI Blend Tank	472 bbl				8760 hr/yr (All Year)
EQT011	11-06 - Tank 8 - TDI Tank	254 bbl				8760 hr/yr (All Year)
EQT012	12-06 - Tank 9 - MDI Rework Tank	254 bbl				8760 hr/yr (All Year)
FUG001	FUG - Fugitive Emissions					8760 hr/yr (All Year)

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP001	All Tanks	EQT1 1-06 - Tank 1 - Aniline Tank
GRP001	All Tanks	EQT2 2-06 - Tank 2 - Aniline Tank
GRP001	All Tanks	EQT3 3-06 - Tank 3 - MDI Tank
GRP001	All Tanks	EQT4 4-06 - Tank 4 - MDI Tank
GRP001	All Tanks	EQT5 5-06 - Tank 5 - MDI Tank
GRP001	All Tanks	EQT6 6-06 - Tank 6 - MDI Tank
GRP001	All Tanks	EQT10 10-06 - Tank 7 - MDI Blend Tank
GRP001	All Tanks	EQT11 11-06 - Tank 8 - TDI Tank
GRP001	All Tanks	EQT12 12-06 - Tank 9 - MDI Rework Tank
GRP002	Aniline Storage Tank Cap	EQT1 1-06 - Tank 1 - Aniline Tank
GRP002	Aniline Storage Tank Cap	EQT2 2-06 - Tank 2 - Aniline Tank
GRP003	MDI Storage Tank Cap	EQT3 3-06 - Tank 3 - MDI Tank
GRP003	MDI Storage Tank Cap	EQT4 4-06 - Tank 4 - MDI Tank
GRP003	MDI Storage Tank Cap	EQT5 5-06 - Tank 5 - MDI Tank
GRP003	MDI Storage Tank Cap	EQT6 6-06 - Tank 6 - MDI Tank
GRP004	Entire Facility	ARE1 13-06 - Barge and Ship Cleaning
GRP004	Entire Facility	EQT1 1-06 - Tank 1 - Aniline Tank
GRP004	Entire Facility	EQT2 2-06 - Tank 2 - Aniline Tank
GRP004	Entire Facility	EQT3 3-06 - Tank 3 - MDI Tank

INVENTORIES

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP004	Entire Facility	EQT4 4-06 - Tank 4 - MDI Tank
GRP004	Entire Facility	EQT5 5-06 - Tank 5 - MDI Tank
GRP004	Entire Facility	EQT6 6-06 - Tank 6 - MDI Tank
GRP004	Entire Facility	EQT7 7-06 - Barge and Ship Transfer Operations
GRP004	Entire Facility	EQT8 8-06 - Drum and Tote Operations (Lines 1-10)
GRP004	Entire Facility	EQT9 9-06 - Tank Truck Loading Operations
GRP004	Entire Facility	EQT10 10-06 - Tank 7 - MDI Blend Tank
GRP004	Entire Facility	EQT11 11-06 - Tank 8 - TDI Tank
GRP004	Entire Facility	EQT12 12-06 - Tank 9 - MDI Rework Tank
GRP004	Entire Facility	FUG1 FUG - Fugitive Emissions

Relationships:

Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)

Fee Information:

Subj Item Id	Multiplier	Units Of Measure	Fee Desc
GRP004			1360 - D) Petroleum, Chemical Bulk Storage and Terminal (500,000 BBL Capacity or Less)

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

All phases

Subject Item	VOC		
	Avg lb/hr	Max lb/hr	Tons/Year
ARE 001 13-06	0.04	0.05	0.18
EQT 001 1-06		0.28	
EQT 002 2-06		0.28	
EQT 003 3-06		< 0.01	
EQT 004 4-06		< 0.01	
EQT 005 5-06		< 0.01	
EQT 006 6-06		< 0.01	
EQT 007 7-06	0.01	0.02	0.06
EQT 008 8-06	0.34	0.44	1.47
EQT 009 9-06	< 0.01	< 0.01	< 0.01
EQT 010 10-06	< 0.01	< 0.01	< 0.01
EQT 011 11-06	< 0.01	< 0.01	< 0.01
EQT 012 12-06	< 0.01	< 0.01	< 0.01
FUG 001 FUG	2.16	2.16	9.45
GRP 002	0.04		0.16
GRP 003	< 0.01		< 0.01

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Phase Totals:

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

All phases

VOC: 45.00 tons/yr

Emission rates Notes:

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

All phases

Subject Item	Aniline			Chlorobenzene			Ethylene glycol			Methylene diphenyl diisocyanate			Nitrobenzene		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
ARE 001 13-06				0.04	0.05	0.18				< 0.01	< 0.01	< 0.01			
EQT 001 1-06		0.27													
EQT 002 2-06		0.27													
EQT 003 3-06										< 0.01	< 0.01	< 0.01			
EQT 004 4-06										< 0.01	< 0.01	< 0.01			
EQT 005 5-06										< 0.01	< 0.01	< 0.01			
EQT 006 6-06										< 0.01	< 0.01	< 0.01			
EQT 007 7-06	0.01	0.02	0.06							< 0.01	< 0.01	< 0.01			
EQT 008 8-06	< 0.01	< 0.01	0.01				0.01	0.01	0.05	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
EQT 009 9-06										< 0.01	< 0.01	< 0.01			
EQT 010 10-06										< 0.01	< 0.01	< 0.01			
EQT 011 11-06															
EQT 012 12-06										< 0.01	< 0.01	< 0.01			
FUG 001 FUG	0.48	0.48	2.08	0.11	0.11	0.50	0.21	0.21	0.94	0.95	0.95	4.17	0.05	0.05	0.22
GRP 002	0.03		0.13												
GRP 003										< 0.01	< 0.01	< 0.01			

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

All phases

Subject Item	Phenol			Toluene-2,4-diisocyanate		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
ARE 001 13-06						
EQT 001 1-06		0.01				
EQT 002 2-06		0.01				
EQT 003 3-06						
EQT 004 4-06						
EQT 005 5-06						
EQT 006 6-06						
EQT 007 7-06	< 0.01	< 0.01	< 0.01			
EQT 008 8-06	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
EQT 009 9-06				< 0.01	< 0.01	< 0.01
EQT 010 10-06				< 0.01	< 0.01	< 0.01
EQT 011 11-06				< 0.01	< 0.01	< 0.01
EQT 012 12-06						
FUG 001 FUG	< 0.01	< 0.01	0.02	0.30	0.30	1.29
GRP 002	0.01		0.03			
GRP 003						

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Parameter Totals:

Toxic air pollutants (TAP): 24.00 tons/yr

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

All phases

Emission Rates Notes:

SPECIFIC REQUIREMENTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

EQT007 7-06 - Barge and Ship Transfer Operations

- 1 Comply with the requirements of LAC 33:III.2108 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2108 as a result of a revision of LAC 33:III.2108. [LAC 33:III.2108.D.4]
- 2 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2108.F.2.a-e, as applicable. [LAC 33:III.2108.F.2]
- 3 Loading gasoline, crude oil or other VOCs into ships or barges is prohibited unless all loading and vapor lines, arms and hoses are equipped with fittings which make vapor-tight connections and provide tight shut-off when disconnected. [LAC 33:III.2108.G.1]
- 4 Prevent spills or leaks during attachment or disconnection of filling lines, hoses or arms. Do not spill liquids or handle in any other manner that would result in evaporation to the atmosphere. [LAC 33:III.2108.G.2]
- 5 Maintain all equipment associated with the loading of gasoline, crude oil or other VOC into ships or barges to be leak-free, gas-tight and in good working order. [LAC 33:III.2108.G.3]

FUG001 FUG - Fugitive Emissions

- 6 Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment. [LAC 33:III.2111]

GRP001 All Tanks

- 7 Vapor pressure: Vapor pressure of contents held in permitted tanks must be less than 1.5 psia. Proof shall be demonstrated by providing the MSDS sheets of all tank contents held in the tank over a 12 month period. Additional information recorded will be the name of chemical stored, length of time stored, and amount stored. Records may be kept in hard copy or electronic formats. [LAC 33:III.501.C.6]

GRP004 Entire Facility

- 8 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 9 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]
- 10 VOC, Total \leq 45.00 tons/yr. Compliance shall be demonstrated by calculating total VOC emissions for the cap each month as well as the sum of the monthly emissions for the previous twelve consecutive months. This calculation shall include storage, handling, and transfer activities associated with ships, barges, railcars, tank trucks and containers such as drums and totes. Total calculated VOC emissions from the cap over the limitation for any consecutive twelve month period shall be a violation of this permit. Notify the Office of Environmental Compliance, Enforcement Division if total VOC emissions exceed the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 11 Combined Toxic air pollutants (TAP) \leq 24.00 tons/yr. Compliance shall be demonstrated by calculating total combined TAP emissions for the cap each month as well as the sum of the monthly emissions for the previous twelve consecutive months. This calculation shall include storage, handling, and transfer activities associated with ships, barges, railcars, tank trucks and containers such as drums and totes. Total calculated combined TAP emissions from the cap over the limitation for any consecutive twelve month period shall be a violation of this permit. Notify the Office of Environmental Compliance, Enforcement Division if total combined TAP emissions exceed the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum

SPECIFIC REQUIREMENTS

AI ID: 147113 - Delta Terminal Services LLC - Geismar Logistics Center

Activity Number: PER20060001

Permit Number: 0180-00194-00

Air - Minor (Synthetic) Initial

GRP004 Entire Facility

- 12 Equipment/operational data recordkeeping by electronic or hard copy monthly. Single TAP, Combined TAPs and VOC emission rates recordkeeping by electronic or hard copy monthly. Keep records of the total emissions from storage, loading, and transfer operations. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]
- 13 Submit report: Due annually, by the 31st of March. Report the single TAP, combined TAPs, and VOC emission rates for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]
- 14 Single Toxic air pollutants (TAP) < 9.00 tons/yr. Compliance shall be demonstrated by calculating single TAP emissions for the cap each month as well as the sum of the monthly emissions for the previous twelve consecutive months. This calculation shall include storage, handling, and transfer activities associated with ships, barges, railcars, tank trucks and containers such as drums and totes. Total calculated single TAP emissions from the cap over the limitation for any consecutive twelve month period shall be a violation of this permit. Notify the Office of Environmental Compliance, Enforcement Division if single TAP emissions exceed the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Maximum
- 15 Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority. [LAC 33:III.5611.A]
- 16 During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations. [LAC 33:III.5611.B]
- 17 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Delta Terminal Services LLC	AI #:	14713	TEMPO Activity No:	PER20060001
Facility Name:	Geismar Logistics Center	Remarks Submitted by:	Trinity Consultants on behalf of Delta Terminal Services, LLC		
Permit Writer:	Mark Browning	Permit Writer Email address:	mark.browning@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet; III. Description (Page 1, last paragraph)	The facility wide emission cap is mentioned as 23.75 tons per year for combined TAPs. Delta Terminal Services had requested a facility wide cap of 24 tons per year for combined TAPs as noted on Page 1 of the application. Delta Terminal Services would like the facility wide cap for combined TAPs changed to 24 tons per year.	Requested changes incorporated into the permit
Air Permit Briefing Sheet; III. Description (Page 2, Estimated emissions from this facility in tons per year)	An estimated TAP emission from this facility is listed as 23.75 tons per year. Delta Terminal Services had requested a facility wide cap of 24 tons per year for combined TAPs as noted on Page 1 of the application. Delta Terminal Services would like the estimated emissions for TAPs changed to 24 tons per year.	Requested changes incorporated into the permit

<p>Air Permit Briefing Sheet; III. Description (Page 2, LAC 33:III. Chapter 51 Toxic Air Pollutant TAP's)</p>	<p>Total TAPs is listed as 23.75 tons per year. Delta Terminal Services had requested a facility wide cap of 24 tons per year for combined TAPs as noted on Page 1 of the application. Delta Terminal Services would like the Total TAPs changed to 24 tons per year.</p>	<p>Requested changes incorporated into the permit</p>
<p>General Information Mailing Address (Page 1 of 1)</p>	<p>The correct mailing address should be 7116 Hwy 22 PO Box 625 Sorrento, LA 70778</p>	<p>Requested changes incorporated into the permit</p>
<p>General Information Related People: Mailing Address for Gene Taft (Page 1 of 1)</p>	<p>This information has been emailed to David Ferrand at facupdate@la.gov.</p>	<p>Requested changes incorporated into the permit</p>
<p>General Information Related Organizations: Mailing Address for Delta Terminal Services LLC (Page 1 of 1)</p>	<p>The correct mailing address should be 7116 Hwy 22, PO Box 625 Sorrento, LA 70778</p> <p>This information has been emailed to David Ferrand at facupdate@la.gov.</p>	<p>Requested changes incorporated into the permit</p>
<p>Inventories ID: EQT001, Tank Volume (Page 1 of 2)</p>	<p>The exact volume of this tank is 1,165,542 gallons (= 27751 bbl) as noted in Page 3 of the application and on the appropriate EIQ sheet. Delta Terminal Services would like the Tank Volume changed to 27751 bbl.</p>	<p>Requested changes incorporated into the permit</p>
<p>Inventories ID: EQT006, Tank Volume (Page 1 of 2)</p>	<p>The exact volume of this tank is 571,116 gallons (=13598 bbl) as noted in Page 3 of the application and on the appropriate EIQ sheet. Delta Terminal Services would like the Tank Volume changed to 13598 bbl.</p>	<p>Requested changes incorporated into the permit</p>
<p>Specific Requirement 6 (Page 1 of 2)</p>	<p>Delta Terminal Services would like this condition removed. Since the facility does not load VOCs with a true vapor pressure of 1.5 psia or greater, this condition does not apply [LAC 33:III.2107] – as noted in Table 2, Page 4 of 6 of the regulatory tables.</p>	<p>Requested changes incorporated into the permit</p>
<p>Specific Requirement 7 (Page 1 of 2)</p>	<p>Delta Terminal Services would like this condition removed. Since the facility does not load VOCs with a true vapor pressure of 1.5 psia or greater, this condition does not apply [LAC 33:III.2107] – as noted in Table 2, Page 4 of 6 of the regulatory tables.</p>	<p>Requested changes incorporated into the permit</p>

<p>Specific Requirement 9 (Page 1 of 2)</p>	<p>Delta Terminal Services would like this condition removed. Since vapor pressure of the VOC components stored at this facility is less than 1.5 psia, this condition does not apply [LAC 33:III.2103] – as noted in Table 2, Pages 2, 3, 4, and 5 of 6 of the regulatory tables.</p>	<p>Requested changes incorporated into the permit</p>
<p>Specific Requirement 10 (Page 1 of 2)</p>	<p>Delta Terminal Services would like this condition removed. Since vapor pressure of the VOC components stored at this facility is less than 1.5 psia, this condition does not apply. [LAC 33:III.2103] – as noted in Table 2, Pages 2, 3, 4, and 5 of 6 of the regulatory tables.</p>	<p>Requested changes incorporated into the permit</p>
<p>Specific Requirement 15 (Page 2 of 2)</p>	<p>Combined Toxic air pollutants (TAP) is mentioned as ≤ 23.75 tons/yr. Delta Terminal Services had requested a facility wide cap of 24 tons per year for combined TAPs as noted on Page 1 of the application. Delta Terminal Services would like the facility wide cap for combined TAPs changed to 24 tons per year.</p>	<p>Requested changes incorporated into the permit</p>



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX-BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

December 18, 2006

Mr. David Vensel
Kinder Morgan Terminals
P.O. Box 625
Sorrento, Louisiana 70778-0625

RE: Ground Water Certification – Proposed Rubicon Handling Terminal
Kinder Morgan Terminals, AI# 39978
Geismar, Iberville Parish, La.

Dear Mr. Vensel:

The Louisiana Department of Environmental Quality – Waste Permits Division (LDEQ-WPD) has reviewed the groundwater certification submittal, dated November 7, 2006 for the proposed Rubicon Handling Terminal Project. Based on this review the WPD has no objection to the project in regard to groundwater contamination issues. A summary of project information and justification is attached. Please contact Celeste Bonnecaze at 225-219-3419 with any questions.

All future correspondence regarding this matter should be submitted in triplicate and directed to: Mr. Bijan Sharafkhani Administrator, Waste Permits Division, P. O. Box 4313, Baton Rouge, LA 70821-4313. One of the copies should be directed to the attention of Celeste Bonnecaze. Please include the Agency Interest (AI) number and the reference line information on all correspondence. Thank you for your cooperation.

Sincerely,

Estuardo Silva, Geologist Supervisor
Waste Permits Division

Attachment – Summary/Justification

c: Dr. Hassan Ghosn, OES, APMAN G3
Imaging Operations – GW

ENVIRONMENTAL SERVICES

PO BOX 4313, BATON ROUGE, LA 70821-4313
P:225-219-3181 F:225-219-3309
WWW.DEQ.LOUISIANA.GOV

SUMMARY/JUSTIFICATION

Kinder Morgan Terminals Proposed Rubicon Handling Terminal; AI# 39978

The Louisiana Department of Environmental Quality – Waste Permits Division (LDEQ-WPD) has no objection to this project in regard to groundwater contamination issues.

Kinder Morgan Terminals is seeking a permit for the construction and operation of a new facility to be located in Geismar, Louisiana. The facility will storage methyl diphenyl diisocyanate (MDI) and aniline and will operate as a drumming facility. The proposed facility location is shown in figure 1.

Construction activities for this project will include installing a 200 foot by 700 foot building and six storage tanks. A five foot, 2 inch-thick foundation will support the new building and a four foot-thick foundation will support each tank. The installation of pilings or deep foundations will not be required for the facility. A site plot plan (figure 2) and a site layout map of facility structures (figure 3) are attached.

The proposed site (24 acres) is currently vacant with vegetation cover. Historically, the site has not been used, but it is located in an industrial area. Surrounding properties includes the abandoned Borden Chemicals Tankfarm to the northwest, parking lots used by Borden Chemicals and Uniroyal employees to the northeast, the Rubicon Facility to the southeast, and a railroad spur to the southwest (refer to figure 2).

A Baseline Environmental Study was conducted for the proposed site. In June 2006, eight geotechnical borings were conducted and soil samples were collected for analysis of priority metals, volatile and semi-volatile organic compounds, mercury, and polynuclear aromatic hydrocarbons (PAHs). Groundwater samples were collected from four borings/temporary wells (KM-1, KM-2, KM-3, and KM-4) installed in July 2006. Additional soil samples were collected from KM-3 and KM-4. Previous geotechnical borings were adjacent to KM-1 and KM-2, so no soil samples were collected from these borings. These samples were analyzed for the same parameters as listed above. The results of the soil and groundwater samples indicated no detectable concentrations of parameters, except for some metals which were detected at concentrations within typical background ranges.

There are existing monitoring wells (MW1, MW2, MW3, MW5, MW6, and MW9) located on the site. The wells were installed due to a benzene pipeline rupture that occurred in the northeast portion of the site near MW6. As part of the Baseline Environmental Study, the wells were sampled in August 2006 and groundwater from MW6 contained 2.94 ppm of benzene. None of the other groundwater samples contained detectable levels of benzene. The benzene contamination has been assessed and monitored by the responsible party, IC Omnimodal Terminal (AI# 90684) with oversight from the LDEQ (pipeline remediation program). The construction activities associated with this project should not impact or exacerbate the groundwater conditions or assessment and remediation activities.